

FACT SHEET

HWMA/RCRA POST-CLOSURE RENEWAL PERMIT U.S. ECOLOGY SITE A EPA ID No. IDD000773952

This fact sheet sets forth the principal facts pertaining to a draft Post-Closure Permit that the Idaho Department of Environmental Quality (DEQ) is proposing to issue to U.S. Ecology Idaho Inc. (USEI). In accordance with IDAPA 58.01.05.012 [40 CFR § 270.10(h)], the Permittee has submitted a renewal Part A and B permit application. The draft Post-Closure Permit sets forth the applicable post-closure requirements DEQ intends to require of U.S. Ecology at the Site A Facility (USEI Site A) located near Bruneau, Idaho.

The regulatory basis for the conditions/requirements of the draft Permit can be found within the Rules and Standards for Hazardous Waste, IDAPA 58.01.05.004 through 58.01.05.013 [40 CFR Parts 124, 260 through 266, 268, and 270]. This fact sheet was prepared in accordance with the requirements of IDAPA 58.01.05.013 [40 CFR § 124.8].

A. PURPOSE OF THE POST-CLOSURE PERMIT

The purpose of the permitting process is to specify administrative and procedural requirements, under which the Permittee will operate, to comply with the Idaho Hazardous Waste Management Act of 1983 (HWMA), as amended, and regulations promulgated thereunder by DEQ. DEQ is required to prepare a draft permit that sets forth, in one concise document, all the applicable requirements that DEQ intends to require the Permittee to comply with during the ten-year duration of the Permit. The public is given forty-five (45) calendar days to review and comment on the draft permit conditions prior to DEQ taking any final action (issue or deny) on the Permit.

This draft Permit was prepared based upon USEI's Part B Permit Application for the post-closure operation of hazardous waste treatment, storage, and disposal units at the Site A facility. The application, supporting data provided by the applicant, and all other documents retained by DEQ in support of the draft Permit are available for review. The DEQ hereby proposes to approve the Site A Post-Closure Permit.

B. PROCEDURES FOR REACHING A FINAL DECISION

IDAPA 58.01.05.013 [40 CFR §124.10] requires that the public be given 45 calendar days to comment on the draft Post-Closure Permit presented for approval under HWMA. The comment period will begin on November 1, 2006, and will end on December 18, 2006. Any person interested in commenting on this plan must do so within this forty-five (45) calendar day comment period.

All persons wishing to comment on the proposed draft Post-Closure Permit should submit their comments in writing to:

*Mr. Robert Bullock
c/o Ms. Jenny Shafer
Idaho Department of Environmental Quality
Waste Management and Remediation Division
1410 North Hilton
Boise, Idaho 83706-1255
(208) 373-0502*

Comments should include all reasonable available references, factual grounds, and supporting material.

Opportunity for a public hearing may be provided if signed, written requests for a hearing in accordance with IDAPA 58.01.05.013 [40 CFR § 124.11] are submitted personally to DEQ and received on or before December 18, 2006. If sufficient public interest is expressed in holding a public hearing, then a formal public hearing will be held. The decision on whether there is sufficient public interest in holding the hearing will be based on the receipt of written comments and requests for a public hearing.

When making the final determination regarding the approval of this Post-Closure Permit, DEQ will consider all written comments received during the public comment period, those received during the public hearing (if held), the requirements of the hazardous waste regulations of IDAPA 58.01.05.000 *et seq.*, and all other applicable federal, state, or local laws.

C. FACILITY/UNIT DESCRIPTION

The U.S. Ecology Site A Facility (Site A) is located approximately 18 miles south of Bruneau, Idaho off Highway 51. The facility was originally constructed as an Air Force Titan Missile Base in the late 1950s. Site A is approximately 30 acres in size and is completely enclosed with chain-link security fencing. USEI owns approximately 82 acres of land including the former missile base. The facility received and disposed of hazardous waste from 1973 to 1983. The waste was disposed of in abandoned missile silos and related underground structures, which were capped and closed as landfills in 1997. The original Part B Closure, Post-Closure Care, Corrective Action Management Unit Permit was issued to Envirosafe Services of Idaho in 1995. All known solid waste management units (SWMUs) and areas of concern (AOC) were identified and closed as part of the previous permitting process. U.S. Ecology of Idaho acquired ownership of Site A along with Site B from Envirosafe Services of Idaho Inc. in 2001. Current site activities consist of post-closure groundwater monitoring, inspections, and maintenance associated with the regulated units.

The ground water monitoring program at Site A was developed based on site-specific information, including that the depth to groundwater is approximately 950 feet, and that the nearest ground water well is located approximately 4 miles north of Site A. Contaminants detected in groundwater samples collected at Site A include chloroform at 1.2 ppb and BTEX constituents at several parts per billion. DEQ concurs that the low concentrations of BTEX constituents found in the groundwater are from a source other than a regulated unit, thus they are not regulated under this permit. Monitoring wells AMW-14 and AMW-16 are currently in the compliance monitoring program.

D. CHRONOLOGY OF REGULATORY ACTIONS

The Part B Closure, Post-Closure Care, and Corrective Action Management Unit Permit for Site A was issued by the DEQ to Envirosafe Services of Idaho Inc. (ESII) effective on November 6, 1995. The Permit required corrective action, facility closure, groundwater monitoring, and post-closure care and maintenance. Monitoring wells AMW-14 and AMW-16 were placed into the Compliance Monitoring Program when USEI reported detections of hazardous constituents in the groundwater which exceeded the detection monitoring criteria. The DEQ issued a modified Part B Permit in August 2002, as part of the required five-year permit review process.

USEI submitted a renewal Permit Application in May 2005, in accordance with IDAPA 58.01.05.012 [40 CFR § 270.10(h)]. Based on DEQ comments, revisions were made to the Permit Application. In accordance with IDAPA 58.01.05.013 [40 CFR §124.3], DEQ determined that the Permit Application was technically complete in August 2006. DEQ is requiring USEI to sample all compliance wells and analyze for all Appendix IX constituents once every 36 months (3 years). Compliance wells will be annually sampled and analyzed for a subset of Appendix IX constituents, (everything but dioxins and furans) for the other two years during the 3-year cycle.

E. CORRECTIVE ACTION REQUIREMENTS

Idaho Code 39-4409(5) requires, in accordance with IDAPA 58.01.05.008 [40 CFR § 264.101(a)], that the owner/operator of a hazardous waste facility institute corrective action as necessary to protect human health and the environment from all releases of hazardous wastes, and/or hazardous waste constituents from any Solid Waste Management Unit(s) (SWMU) at the facility, regardless of when the waste was placed in such units.

At the time of issuance of the draft Permit, there were no known SWMUs requiring corrective action. However, Module IV of the Permit contains provisions for evaluation, initiation, and completion of corrective action at any newly identified SWMUs.

F. POST-CLOSURE PERMIT ORGANIZATION

The Post-Closure Permit is divided into five (5) Modules, with associated figures and tables, and seven (7) Attachments as follows.

Module	Title
I	Standard Permit Conditions
II	General Facility Conditions
III	Groundwater Monitoring
IV	Corrective Action
V	Post-Closure Care

Attachment	Topic
1	Facility Description and Site Maps
2	Post-Closure Plan
3	Post-Closure Financial Requirements
4	Groundwater Monitoring Plan
5	Groundwater Sampling and Analysis Plan
6	RCRA Part A Application
7	Permit Modification Tracking Log